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September 6, 2016

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (MG)**

Letter Regarding Update on Related Proceedings

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in the *Norville* case pending in MDL 2543, and New GM’s previous request for a status conference in connection with a successor liability claim (“**Successor Liability Issue**”) asserted by the *Norville* plaintiff.

We previously have written the Court about the *Norville* plaintiff’s request for summary judgment on the Successor Liability Issue, New GM’s opposition thereto, and the *Norville* plaintiff’s withdrawal of her summary judgment motion on the Successor Liability Issue. Late last week, New GM and the *Norville* plaintiff reached a *settlement* which resolves all issues raised in the *Norville* case.

In light of the *Norville* settlement, there is no longer a pressing need to schedule an immediate status conference on the Successor Liability Issue, and New GM withdraws its request for same. The Successor Liability Issue will still be included in the list of issues that New GM believes the Bankruptcy Court should address, but those issues and the procedures for addressing them can be discussed at the status conference previously requested to take place in the beginning of October 2016.

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If the Court has any questions or needs additional information, please let me know.

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd

cc: Parties Set Forth On Schedule "1" Annexed Hereto.

SCHEDULE 1

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Parties to the Motion to Enforce, filed by New GM on June 1, 2016 [Dkt No. 13634]

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Parties to the Motion to Enforce filed by New GM on June 24, 2016 [Dkt No. 13655]

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Parties Subject to the Pilgrim Motion to Enforce

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